

1 **P O R T E R | S C O T T**

2 A PROFESSIONAL CORPORATION

3 John R. Whitefleet, SBN 213301

4 Jennifer L. Thompson, SBN 337107

5 350 University Ave., Suite 200

6 Sacramento, California 95825

7 jwhitefleet@porterscott.com

8 jthompson@porterscott.com

9 TEL: 916.929.1481

10 FAX: 916.927.3706

11 Attorney for Defendants

12 CITY OF RANCHO CORDOVA,

13 NATHAN DANIEL, JOSEPH ZALEC,

14 AND DEREK HUTCHINS

15 Van Longyear, SBN 84189

16 Nicole M. Cahill, SBN 287165

17 LONGYEAR & LAVRA, LLP

18 555 University Ave., Suite 280

19 Sacramento, CA 95825

20 Tel: 916-974-8500

21 Fax: 916-974-8510

22 Attorneys for Defendant

23 COUNTY OF SACRAMENTO

24 Lawrance A. Bohm, SBN 208716

25 Daniel T. Newman, SBN 314937

26 BOHM LAW GROUP, INC.

27 4600 Northgate Boulevard, Suite 210

28 Sacramento, CA 95834

TEL: 866.920.1292

FAX: 916.927.2046

Attorneys for Plaintiffs

THOMAS WILLIAMS

AND CARLOS WILLIAMS

///

///

///

///

1
2 **UNITED STATES DISTRICT COURT**
3 **EASTERN DISTRICT OF CALIFORNIA**
4

5 THOMAS WILLIAMS,
6

7 Plaintiff,
8

9 v.
10

11 Case No. 2:20-cv-00598-TLN-KJN
12 Case No. 2:19-cv-02345-TLN-KJN
13

14 **JOINT STIPULATION AND ORDER TO**
15 **CONTINUE PRE-TRIAL DEADLINES**
16

17 COUNTY OF SACRAMENTO; CITY OF
18 RANCHO CORDOVA; NATHAN
19 DANIEL; JOSEPH ZALEC; DEREK
20 HUTCHINS and DOES 1 through 50
21 inclusive,
22

23 Defendants.

24 /

25 CARLOS WILLIAMS
26

27 Plaintiff
28

29 v.
30

31 COUNTY OF SACRAMENTO;
32 RANCHO CORDOVA POLICE DEPARTMENT;
33 and DOES 1 through 50 inclusive,
34

35 Defendants.

36 /

37 Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and Defendants
38 COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN DANIEL, JOSEPH
39 ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and through their (“Parties”)
40 counsel of record, hereby stipulate and request that the Court continue the discovery deadline for 30 days
41 for the limited purpose of completing the defendant deputies’ depositions and 90 days for the limited
42 purpose of facilitating the production of records pursuant to the Court’s January 6, 2023 Order [Dkt. Nos.
43

1 43 & 48]. The Parties further request the extension of the other pre-trial deadlines in this matter. Good
2 cause exists for the requested continuance pursuant to Federal Rules of Civil Procedure Rule 16(d) based
3 upon the following:

4 1. On July 15, 2021, this Court consolidated the above-referenced cases with respect to
5 discovery only.

6 2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an Amended
7 Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the same Order on
8 October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

9 3. On April 6, 2022, this Court granted the Parties' joint stipulation to extend the pre-trial
10 deadlines, which extended the fact discovery deadline to January 12, 2023.

11 4. On January 4, 5, and 6, 2023, Plaintiffs began deposing Deputies Daniel, Zalec, and
12 Hutchins. Those depositions, however, did not conclude. The Parties agreed to continue the Deputies'
13 depositions until the end of January. The Parties request a 30-day extension of the discovery deadline for
14 the limited purpose of completing the Deputies' depositions.

15 5. Furthermore, on January 6, 2023, Magistrate Kendall Newman granted in part Defendant
16 City of Rancho Cordova's Motion to Compel and ordered Plaintiffs to produce additional financial records
17 within 30 days. [Dkt. Nos. 43 in 2:19-cv-02345-TLN-KJN and 48 in 2:20-cv-00598-TLN-KJN].

18 6. The Parties also seek an extension of the pre-trial deadlines of 90 days for the limited
19 purpose of facilitating the production of documents consistent with Judge Newman's order and for the
20 Parties to resolve any disputes related to said production.

21 7. Because the Parties anticipate sending the financial records and deposition transcripts to
22 experts in this matter, the Parties request that expert disclosure dates and dispositive motions also be
23 extended.

24 8. The Parties also agree to extend discovery for the limited purpose of having Plaintiffs'
25 expert examine the physical camera that was in Deputy Daniel's vehicle on the night of the incident and
26 subsequently removed. The Parties request a 90-day extension of the discovery deadline for the limited
27 purpose of arranging for Plaintiffs' expert to examine the physical camera at Defense Counsel's office.

28 9. The Parties, through their respective undersigned counsel, agree and hereby do stipulate to

1 respectfully request that the Court modify the scheduling order as follows:

Event	Schedule	Proposed New Schedule
Fact Discovery	January 12, 2023	To complete the Deputies' depositions: February 13, 2023 To facilitate production pursuant to Judge Newman's January 6, 2023 Order and Plaintiffs' inspection of camera: April 12, 2023
Expert Witness Disclosure	March 14, 2023	June 12, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Remains unchanged
Dispositive Motions	August 15, 2023	November 13, 2023

13
14 Dated: January 19, 2023

BOHM LAW GROUP, INC.

15
16 By: /s/ Kelsey K. Ciarimboli (auth. 1/18/23)
17 Lawrence A. Bohm
18 Kelsey K. Ciarimboli
19 Daniel T. Newman
20 Attorney for Plaintiffs

21 Dated: January 19, 2023

LONGYEAR & LAVRA, LLP

22
23 By: /s/ Nicole M. Cahill (auth. 1/18/23)
24 Van Longyear
25 Nicole M. Cahill
26 Attorney for Defendant
27 COUNTY OF SACRAMENTO

28 ///

///

///

1 Dated: January 19, 2023

PORTER SCOTT
A PROFESSIONAL CORPORATION

3 By: /s/ Jennifer L. Thompson

4 John R. Whitefleet
5 Jennifer L. Thompson
6 Attorney for Defendants
7 CITY OF RANCHO CORDOVA,
NATHAN DANIEL, JOSEPH ZALEC,
AND DEREK HUTCHINS

10 **ORDER**

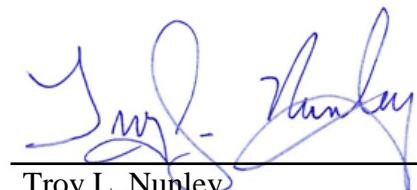
11 Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby
12 ORDERS as follows:

- 13 1. The pre-trial deadlines in this case shall be amended as follows:

Event	Schedule	Proposed New Schedule
Fact Discovery	January 12, 2023	To complete the Deputies' depositions: February 13, 2023 To facilitate production pursuant to Judge Newman's January 6, 2023 Order and Plaintiff's inspection of camera: April 12, 2023
Expert Witness Disclosure	March 14, 2023	June 12, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Remains unchanged
Dispositive Motions	August 15, 2023	November 13, 2023

25 **IT IS SO ORDERED.**

26
27 Dated: January 19, 2023
28



Troy L. Nunley
United States District Judge